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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2018 JUN 20 PM 1:25

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff

v.

MANUEL BRANDON GARZA (1),
JESUS MANUEL IBARRA (2),
[REDACTED]
[REDACTED]

Defendants

§ Criminal No.:

SA 18 CR 0439 DAE
INDICTMENT

§ [Violations:

§ Counts 1, 2 and 3 - 18 U.S.C. §
§ 924(a)(1)(A) and 2, Aiding and Abetting
§ False Statement During Purchase of a
§ Firearm;
§ Count 4 - 18 U.S.C. § 554 and 2 - Aiding
§ and Abetting Smuggling Goods from the
§ United States]

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 924(a)(1)(A) and 2]

On or about October 11, 2017, in the Western District of Texas, Defendants,

MANUEL BRANDON GARZA,

JESUS MANUEL IBARRA,
[REDACTED]
[REDACTED]

aiding and abetting another, knowingly made a false statement and representation to R.S. a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Gun Shack LLC, in that Defendant [REDACTED] did execute a Department of Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record,

to the effect that [REDACTED] was the actual transferee/buyer of the firearms, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

COUNT TWO
[18 U.S.C. § 924(a)(1)(A) and 2]

On or about September 28, 2017, in the Western District of Texas, Defendants,

JESUSE MANUEL IBARRA,

and

[REDACTED]
aiding and abetting another, knowingly made a false statement and representation to J.K. a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Gun Shack LLC, in that Defendant [REDACTED] did execute a Department of Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that [REDACTED] was the actual transferee/buyer of the firearms, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

COUNT THREE
[18 U.S.C. § 924(a)(1)(A) and 2]

On or about October 12, 2017, in the Western District of Texas, Defendants,

JESUSE MANUEL IBARRA,

and

[REDACTED],

aiding and abetting another, knowingly made a false statement and representation to C.M. a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be

kept in the records of Modern Elite Firearms LLC, in that Defendant [REDACTED] did execute a Department of Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that [REDACTED] was the actual transferee/buyer of the firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

COUNT FOUR
[18 U.S.C. § 554 and 2]

That beginning on or about September 28, 2017, and continuing through on or about October 12, 2017, in the Western District of Texas, and elsewhere, Defendant,

MANUEL BRANDON GARZA,

and

JESUSE MANUEL IBARRA,

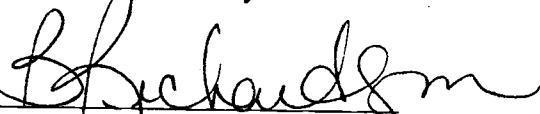
aiding and abetting another, did willfully and knowingly export and send, and attempt to export and send, firearms from the United States to the Republic of Mexico, contrary to the laws and regulations of the United States, in violation of Title 18, United States Code, Section 554 and 2.

A TRUE BILL.

[REDACTED]

FOREPERSON OF THE GRAND JURY

JOHN F. BASH
United States Attorney

By: 
BETTINA RICHARDSON
Assistant United States Attorney